

Affidavit

United States of America
Southern District of California ss.

1 I, KENDRICK GREEN, state that:
 2 I currently reside at 816 North Inglewood Ave., #8, Inglewood, CA 90302. I have owned 816
 3 North Inglewood Ave., #8 since the late 1990's.
 4 My current cell phone number is 213-819-1276. My social security number is
 5 and my date of birth is _____. My California drivers license number is
 6 Special Agent Darline Toussaint and Morgan Bailey interviewed me on 3/29/2011 regarding
 7 seven properties that I purchased in San Diego during 2006 and 2007 through _____
 8 _____, _____ real estate company. I can not remember the name of the real
 9 estate company, but it was located off the 8 East Freeway in the San Diego area.
 10 The name Advanced Partnership Properties sounds familiar to me. I specifically remember the
 11 name Advanced because _____ email included the word Advanced on it.
 12 During the interview on March 29, the Special Agents showed me copies of Uniform
 13 Residential Loan Applications with my signatures for the properties located at 3532 Meade
 14 Ave. #7 San Diego, CA 92116; 3532 Meade Ave. #32 San Diego, CA 92116; 3532 Meade
 15 Ave. #41 San Diego, CA 92116; and 6824 Rolando Knolls Dr. San Diego, CA 91941. Copies
 16 of the above loan applications were also shown to me today to assist me in refreshing my
 17 memory. I identified my signatures on the above loan applications and the loan applications
 18 appear to be the same loan applications that I signed in 2006 and 2007 when I purchased the
 19 above properties.
 20 During the March 29 interview, the Special Agents also showed me an un-signed Residential
 21 Loan Application for the property located at 635 San Miguel Ave., Spring Valley, CA 91977.
 22 This same loan application was shown again to me today. I purchased 635 San Miguel and
 23 the loan application appears to be the same loan application that I signed when I purchased
 24 the above property.
 25 I also purchased the properties located at 3532 Meade Ave. #40 San Diego, CA 92116 and
 26 3532 Meade Ave. #31 San Diego, CA.
 27 During the March 29th interview, the Special Agents also showed me various escrow and loan
 28 documents, including HUD 1 closing statements for the above properties. The escrow and
 29 loan documents were also made available for me to review today to refresh my memory for
 30 this affidavit.
 31 During 2006 and 2007, I was an Account Executive at a company called WMC. WMC was
 32 known as Weyerhaeuser Mortgage Company, and then was taken over by General Electric.

Affiant's Signature/Initial _____

Affidavit (continued)

33 WMC was a wholesale originator of subprime residential mortgages. WMC is no longer in
 34 business.

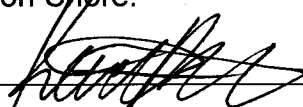
35 My job at WMC as an Account Executive was to find clients for WMC. I was in charge of the
 36 San Diego area and as part of my job I visited various real estate offices in the San Diego area
 37 and performed sales pitches for the real estate offices to submit loan applications to WMC.
 38 WMC gave me a list of real estate offices in San Diego to visit. I would contact the real estate
 39 office and let them know that I was part of WMC and would try to get that particular real estate
 40 office to have their loans funded through WMC. [redacted] was the point of contact at one of
 41 the San Diego real estate companies.

42 I initially told the agents during my March 29th interview that I met [redacted] at the office where
 43 [redacted] worked, but I now remember that I met [redacted] at a company called
 44 Countywide where [redacted] used to work. At some point, [redacted] left Countywide and
 45 started working at a real estate company with [redacted]. [redacted] took my contact
 46 information with her when she left Countywide and contacted me when she started working
 47 with [redacted]. [redacted] appeared to be the person in charge of the real estate company where
 48 [redacted] moved to after [redacted] worked at Countywide. [redacted] appeared to be at the company to
 49 make sure things were running right. I remember that there were several other individuals who
 50 worked at the office with [redacted], however, I do not recall all of their names. I
 51 remember one other person that worked there that looked like she was Indian, I think her
 52 name was Maggie. I think Maggie was a processor. I also remember another employee
 53 named [redacted]. I believe that [redacted] helped in some way at the company. When I telephoned
 54 the company, if [redacted] was not there, then [redacted] would assist me. There were not a lot of
 55 employees at the company, it was a really small shop. [redacted] was a loan officer at the
 56 company.

57 [redacted] informed me that her company where [redacted] was working with [redacted] was looking for a
 58 real estate broker to work with. I introduced a real estate broker named Dorita Edwards who
 59 is also known as Jocelyn Edwards (Edwards) to Gonzalez. Once I introduced Edwards to
 60 [redacted] I "running deals" through Edwards. I met Edwards at a broker
 61 convention when I worked at WMC. Edwards told me that she really needed some business,
 62 and I told Edwards that I would keep my eyes out for any business. Edwards was not married
 63 that I knew of. I visited Edwards at her home a few times and she just had her son there, and
 64 it did not appear that she was married.

65 Edwards was located in the Laguna Niguel area. [redacted] said they needed a second broker
 66 and that they needed to "run their deals" through another broker. I believe that the first broker
 67 was Don Shore. I have never met Don Shore.

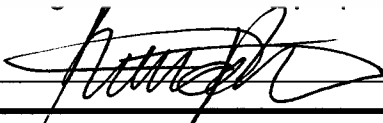
Affiant's Signature/Initial



Affidavit (continued)

68 Sometime in 2006, () told me about an investment opportunity where I could purchase
69 properties as investments to make money.
70 I first purchased two residential properties from () company were
71 soliciting buyers, by telling them that they did not have to pay any money down, and that they
72 could get immediate equity out of the properties purchased.
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77 I agreed to purchase the properties, because I felt like I would be able to
78 keep up with the mortgage payments with renters in each property.
79 During the March 29th interview, I told Special Agent Toussaint and Bailey that
80 () company paid for three months worth of mortgage payments for each property directly to
81 the lender. I told the Special Agents that other than a few hundred dollars for minor repairs
82 and the three months mortgage payments made to the lenders, I did not directly receive any
83 additional money for the purchase of the seven properties. I also told the agents that one of
84 the reasons that I agreed to purchase the properties is because () told me that I would
85 be able to refinance and make money out of the deal, however this is not true, () did
86 not tell me that. After speaking with (), I agreed to make the purchases and drove
87 down to San Diego and signed the loan documents, but I was not thinking. What I previously
88 stated to the agents on March 29th was not correct. () r company did promise
89 three months worth of mortgage payments, however the payments were given to me directly
90 as cashiers checks () : told me that I did not have to pay the
91 mortgage for the first month on each property.
92 I also told the agents on March 29th that () told me that paying the mortgage for three
93 months was something that () company did for other buyers, but this is also not true, as
94 () did not tell me this.
95 I did not have any construction work done on any of the properties that I purchased as part of
96 escrow.
97 During my purchase of the properties, () informed me that I did not need to wait until
98 after the close of escrow to refinance the properties, because the equity could be taken out
99 during escrow.

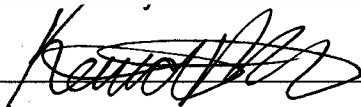
Affiant's Signature/Initial



Affidavit (continued)

103 It took me a long time
 104 to get convinced.
 105 I remember seeing buyers leaving office, and they seemed happy. It
 106 appeared that the buyers were getting the money that was promised, so I decided to do it.
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 110 I telephoned Special Agent Toussaint on March 31, 2011 and informed her that my original
 111 statements regarding monetary benefits for the purchase of the seven properties were not true
 112 because I received cashier's checks from for the purchase of the properties. I originally
 113 did not tell the Special Agents the truth because I was nervous and scared.
 114 For one of the transactions, said "follow me to the bank." I think it was for one of the first
 115 two properties. I do not recall the name of the bank,
 116 I waited for
 117 in the parking lot, and she provided me with the cashiers checks in the parking lot of the
 118 bank.
 119 On other occasions, I received cashiers checks in office The only
 120 individuals that gave me cashiers checks as part of my purchase were I
 121 travelled to San Diego seven times to pick up cashiers checks I
 122 received cashiers checks each time I purchased a property I
 123 received a total of approximately \$170,000 in cashiers checks I
 124 deposited the cashiers checks in my bank account at Bank of America. I no longer have a
 125 bank account at Bank of America.
 126
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 128
 129 told me not to worry and that she had everything covered. I
 130 eventually decided that the purchase of the properties were a good investment and decided to
 131 purchase the properties.
 132 I agreed to purchase the properties, because I felt like I would be able to keep up with the
 133 mortgage payments with renters in each property.
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Affiant's Signature/Initial



Affidavit (continued)

138 I signed all of the loan applications for the properties at an escrow office in San Diego. The
 139 escrow office was not the same office where _____ worked, it was located in
 140 Downtown San Diego. I do not remember the name of the escrow officer, but I remember that
 141 it was the same person for each property.

142 I also signed loan documents at my house when a few notaries came to my house to have me
 143 sign some of the documents. The notary came to my house approximately two times.

144
 145 I signed all of my Residential Loan Applications at the close of escrow. I do not remember
 146 seeing any of the loan applications prior to the close of escrow.

147 I do not know who actually filled out or completed any of my loan applications. I never filled
 148 out any of the loan applications myself.

149 I used approximately \$100,000 of the cashier's checks that I received from _____ to
 150 purchase a property in Chicago through Edwards.

151 I purchased 6824 Rolando Knolls Drive for \$599,800. The property closed escrow on April 7,
 152 2006. I drove to San Diego to look at the property _____. The Residential Loan
 153 Application dated 3/31/2006 states that the property would be my primary residence. I planned
 154 on living in the property, however that did not happen. The loan application states that my
 155 income was \$13,000 per month, and that I worked at WMC. I was working for WMC during the
 156 time, however my income was between 10,000 to 12,000 per month. My income varied
 157 because I was in sales. After seeing the name "Accurate Lenders" on my loan application, I
 158 think that this may have been the name of the office where _____ worked. I remember the
 159 name "Accurate Lenders" and the name "Advanced" as companies related to _____,
 160 _____. I do not know who Donald Shore is, but I remember hearing his name in
 161 _____ office. I have never met Donald Shore. I do not know why there is a pay-out of
 162 \$69,000 to BYW Construction LLC on the HUD1 settlement statement dated 4/7/2006. I have
 163 never heard of BYW Construction LLC. I do not know anything about BYW Construction. The
 164 Special Agents showed me a contractors invoice from BYW Construction dated 3/9/2006. I
 165 have never seen this invoice. I do not recognize the signature on the invoice.

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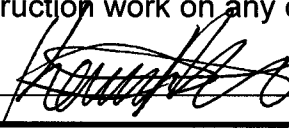
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172 I never hired BYW to perform any construction work on any of the properties that I purchased.

Affiant's Signature/Initial _____



Affidavit (continued)

173 I purchased 635 San Miguel Ave., Spring Valley, CA 91977, which closed escrow on May 31,
 174 2006. I looked at San Miguel Ave. with before I decided to purchase it. The sale
 175 price of the property was \$550,000. When agents interviewed me on March 29th, I initially told
 176 them that I planned on using the San Miguel Ave., property as my primary residence; however
 177 after reviewing the escrow and loan documents, I remembered that it was Rolando Knolls
 178 property that I planned on using as my primary residence, not San Miguel. At the end, I did not
 179 use either property as my primary residence. The Residential Loan Application for 635 San
 180 Miguel Ave., Spring Valley CA states that I earn \$15,300 per month. As stated previously, my
 181 actual income averaged between \$10,000 and 12,000 per month. I do not know why the loan
 182 application states that the property will be my primary residence. I do not know why there is a
 183 pay-out to BYW Construction for \$93,000 on the HUD1 Settlement Statement dated 6/2/2006.
 184 I do not know who or what BYW is. The Special Agents showed me an invoice dated April,
 185 2006 from BYW Inc in the amount of \$93,000. I have never seen this invoice. As I stated
 186 previously, I never hired BYW to perform any work on any of the properties that I purchased.
 187 I purchased San Miguel Ave. as an investment. I initially planned on fixing up San Miguel to
 188 rent it out, however I never rented out San Miguel. San Miguel needed a lot of work and I
 189 never got the work done to get it ready to be rented out. I made the mortgage payments on
 190 San Miguel for approximately seven months.

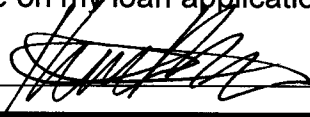
191 The two Residential Loan Applications for 3532 Meade Ave., #7, San Diego CA states that the
 192 property would be an investment property. This is accurate because I rented out the property
 193 and purchased it as an investment property. I do not know why there is a pay-out to BYW Inc.
 194 of \$75,000 on the HUD1 Settlement statement dated 2/15/2007. As I stated before, I did not
 195 hire BYW to perform any work on any of the properties that I purchased.

196 Escrow closed on 3532 Meade Ave., #31, San Diego, CA on 1/4/2007. I do not know why
 197 there is a pay out to BYW Inc. of \$75,000 on the HUD1 Settlement Statement dated 1/4/2007.

198 The two Residential Loan Applications for 3532 Meade Ave., # 32, San Diego, CA states that
 199 the property would be an investment property. This statement is correct because I purchased
 200 the property as an investment property to rent out. The company named MB&S on the loan
 201 application was an actual company that I had created, but it was not an active company during
 202 the time that I purchased the properties.

203 The individual told me that I needed to come
 204 up with another job to place on the loan application. The individual asked me if I had a
 205 company name or another business name that could be used on my loan application. I told
 206 the person on the phone that I had an inactive company from years ago. I gave the individual
 207 the company name MB&S Inc. to place on my loan application. I can not remember who I

Affiant's Signature/Initial



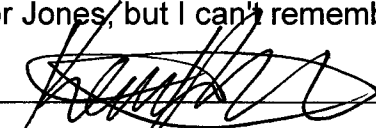
Affidavit (continued)

208 gave the company name to for placement on the loan application,
 209 . The loan application states that my monthly income was \$23,300 per
 210 month. I have never made \$23,300 amount of money per month. As I previously stated, I
 211 made on average \$10,000 to 12,000 per month. I do not know if the net worth on the loan
 212 application listed as \$190,000 is accurate, I would have to check my records to verify it. I had
 213 a Bank of America and a Washington Mutual bank during this time, however I can not
 214 remember how much money I had in the bank accounts. account I do not know why there is a
 215 pay-out to BYW Inc of \$80,000 on the HUD1 Settlement Statement dated 4/5/2007. The
 216 Special Agents showed me a Verification of Deposit dated 12/26/2006 from Washington
 217 Mutual Bank showing a current balance of approximately \$99,000. I have never had an
 218 account balance of \$99,000. I had an account at Washington Mutual which included a line of
 219 credit. I initially told the agents on March 29th that the largest amount that I ever had in my
 220 account was no more than \$30,000, however now I can not remember. When I said \$30,000
 221 to the agents, I may have been thinking about Bank of America. It is possible that I had
 222 \$99,000 in my Washington Mutual Bank account, but I would have to check my bank
 223 statements for that time. I was shown a letter dated 3/23/2007 signed by John McKinney
 224 (McKinney) stating in part that M&M had been preparing business tax forms schedule C for
 225 me since tax year 2003 to the present. McKinney was my return preparer at one time.
 226 McKinney prepared my business tax returns for me for my company MB&S during 2007 and
 227 2008.

228 Escrow closed on 3532 Meade Ave., #40, San Diego, CA on 2/22/2007. I do not know why
 229 there is a pay out to BYW Inc of \$77,500 on the HUD1 Settlement Statement dated 2/22/2007.
 230 The Residential Loan application for 3532 Meade Ave., #41 San Diego, CA list the property as
 231 secondary residence. This is not accurate because I purchased the property as an investment
 232 and rented out the property. I was not making \$22,800 per month in income as stated in the
 233 loan application. I was not making \$22,800 per month during this time. I do not know why
 234 there is a pay out to BYW Inc of \$77,500 on the HUD1 Settlement Statement dated 2/23/2007.
 235 All of the properties I purchased at Meade were investment properties.
 236 I never met the seller of the Meade properties.

237 Special Agent Murillo showed me copies of Washington Mutual cashiers cashiers check
 238 numbers 356221762, dated 4/12/2006, in the amount of \$9,000; 356221763, dated 4/12/2006
 239 in the amount of \$9,000; 356221764, dated 4/12/2006 in the amount of \$9,000; 356221765,
 240 dated 4/12/2006 in the amount of \$9,000; 356221766, dated 4/12/2006 in the amount of
 241 \$9,000; and 356221768, dated 4/12/2006 in the amount of \$5,000. I remember receiving a
 242 lump sum of cashiers checks from Dana or Jones, but I can't remember which one gave me

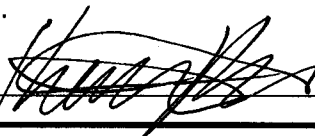
Affiant's Signature/Initial



Affidavit (continued)

243 the cashiers checks. The cashiers checks may have been for my purchase of Rolando Knolls
244 because Rolando Knolls closed escrow on 4/7/2006. they were
245 giving me the cashiers checks seperately so that when I deposited the money in my bank
246 account, there would not be any red flags on my bank account. They told me that I should not
247 deposit all of the cashiers checks in my bank account all at once because the banks would
248 report it to the government. They told me not to deposit the money all at once. I deposited the
249 cashiers checks into my Bank of America account by depositing them one per day.
250 Special Agent Murillo showed me Washington Mutual Cashiers Checks numbers 575949946,
251 dated 6/5/2006 in the amount of \$6,000; 575949947, dated 6/5/2006 in the amount of \$6,000;
252 and 575949948, dated 6/5/2006 in the amount of \$6,000.
253 The cahiers checks may have been for my purchase of San
254 Miguel because the property closed escrow on 5/31/2006. All of the cashiers checks shown to
255 me state "Pay to the order of Kendrick Green." I received all of the cashiers check from [redacted].
256 I also received approximately \$15,000 to \$20,000 each worth of cashiers
257 checks for my purchase of each condo located at Meade Ave.
258 Other than the seven properties mentioned above, I did not purchase any additional properties
259
260 During my interview on March 29th, Special Agent Toussaint showed me copies of my U.S.
261 Individual Income Tax Returns, Forms 1040 for the years 2006, 2007, and 2008. The tax
262 returns were also shown to me today. The 2006, 2007, and 2008 U.S. Individual Income tax
263 Returns are the tax returns that I filed and the signatures on the tax returns are my signatures.
264 My wages on the above tax returns that states \$81,896 for 2006; \$7,938 for 2007 and \$14,406
265 for 2008 was the actual income that I was making at the time. The Schedule E on my 2006
266 income tax return lists 635 San Miguel as my rental property, and that I received total rental
267 payments of \$6,750 for the year. The Schedule E on my 2007 income tax return lists 635 San
268 Miguel and 3532 Meade Ave., as my rental propeties and that I received \$18,000 in rental
269 payments that year. The Schedule E on my 2008 income tax return lists my rental properties
270 as 635 San Miguel; 3532 Meade Ave.; 819 E Drexel Sq., Chicago IL and that I made \$3,335 in
271 rental payments that year. I do not know why my tax returns states that San Miguel was a
272 rental property because I did not rent out San Miguel. The income on the tax returns are
273 accurate, and the income on the loan applications were not.
274 I sent my Form W-2's to assist in preparing my loan applications.
275 I stopped working at WMC sometime in 2007.
276 The last contact I had with Edwards was sometime in 2008 when she sent me an email stating
277 that she was moving to Chicago or Michigan.

Affiant's Signature/Initial



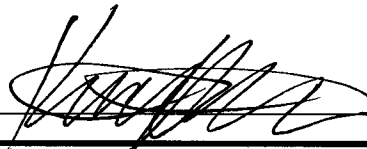
Affidavit (continued)

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As part of the subpoena served on me on March 29th, I provided one legal size file folder containing various documents relating to the properties that I purchased in San Diego "

I did not find any loan applications relating to the properties that I purchased. I will check my records again, and if I find additional documents, I will mail them to address on the subpoena.


Affiant's Signature/Initial




Affidavit (continued)

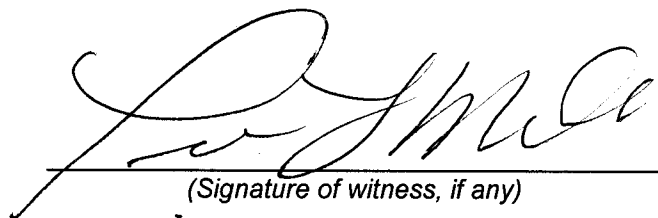
I have read the foregoing statement consisting of 9 page(s), each of which I have signed. I fully understand this statement and it is true, accurate and complete to the best of my knowledge and belief. I made the corrections shown and placed my initials opposite each.

I made this statement freely and voluntarily without any threats or rewards, or promises of reward having been made to me in return for it.


(Signature of affiant)

Subscribed and sworn to before me this 14th
day of April, 2011
at U.S. Attorney's Office, 880 Front Street
San Diego, CA


(Signature)
Darline Toussaint
Special Agent
(Title)
Internal Revenue Service


(Signature of witness, if any)
LETICIA MURILLO - IRS SPECIAL
AGENT